

# **EXHIBIT A**

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

TERRI PECHNER-JAMES and SONIA  
FERNANDEZ,

Plaintiffs,

v.

C.A. No. 03-12499-MLW

CITY OF REVERE, THOMAS AMBROSINO,  
MAYOR, CITY OF REVERE POLICE  
DEPARTMENT, TERRENCE REARDON,  
CHIEF OF POLICE, BERNARD FOSTER,  
SALVATORE SANTORO, ROY COLANNINO,  
FREDERICK ROLAND, THOMAS DOHERTY,  
JOHN NELSON, JAMES RUSSO, MICHAEL  
MURPHY and STEVEN FORD,

Defendants,

**DEFENDANTS, CITY OF REVERE'S, CITY OF REVERE POLICE  
DEPARTMENT'S, MAYOR THOMAS AMBROSINO'S AND POLICE CHIEF  
TERRENCE REARDON'S ANSWERS TO PLAINTIFFS, TERRI PECHNER-JAMES'  
AND SONIA FERNANDEZ' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Now comes Defendants, City of Revere, City of Revere Police Department, Mayor Thomas Ambrosino and Police Chief Terence Reardon and hereby submits there responses to Plaintiff, 'Terri Pechner-James' and Sonia Fernandez' First Request for Production of Documents.

1. Full and complete copies of any and all documents that show the annual income derived from "paid detail" work received by male officers of the same rank as the Plaintiffs from September 1995 to present.

Objection. This request is irrelevant and not reasonably calculated to lead to the discovery of relevant or admissible information. Moreover, the request is overbroad as to time. The documents, to the extent they still exist, will not be produced.

2. Full and complete copies of any and all documents that show the annual amount of "paid detail" income received by Plaintiffs, Terri Pechner-James and Sonia Fernandez, respectively, from September 1995 to present.

Objection. This request is irrelevant and not reasonably calculated to lead to the discovery of relevant or admissible information. Moreover, these records should already be in Plaintiffs' possession. Additionally, the request is overbroad as to time. The documents, to the extent they still exist, will not be produced.

3. Full and complete copies of any and all documents that show the annual amount of overtime pay earned by the average male officers of the same rank from September 1995 to present.

Objection. This request is irrelevant and not reasonably calculated to lead to the discovery of relevant or admissible information. Moreover, the phrase "average male officers" is vague and ambiguous. Additionally, the request is overbroad as to time. The documents, to the extent they still exist, will not be produced.

4. Full and complete copies of any and all documents that show the annual amount of overtime income received by each of the Plaintiffs, Terri Pechner-James and Sonia Fernandez from September 1995 to present.

Objection. This request is irrelevant and not reasonably calculated to lead to the discovery of relevant or admissible information. Moreover, these records should already be in Plaintiffs' possession. Additionally, the request is overbroad as to time. The documents, to the extent they still exist, will not be produced.

5. Full and complete copies of any and all documents that show the annual percentage or amount of any cost of living or other indexed cost of living increases contained in the contract(s) that governed the salaries and working conditions of the officers in the Revere Police Department.

Objection. This request is irrelevant and not reasonably calculated to lead to the discovery of relevant or admissible information. Additionally, the request is overbroad as to time. The documents, to the extent they still exist, will not be produced.

6. Full and complete copies of any and all documents that show the cost of living, contractual or other kind of increases that both Terri Pechner-James and Sonia Fernandez received between September 1995 to Present.

Objection. This request is irrelevant and not reasonably calculated to lead to the discovery of relevant or admissible information. Moreover, these records should already be in Plaintiffs' possession. Additionally, the request is overbroad as to time. The documents, to the extent they still exist, will not be produced.

7. Full and complete copies of any and all documents that show the annual value of the benefit package provided to the Revere police officers of the same rank as the Plaintiffs.

Objection. This request is irrelevant and not reasonably calculated to lead to the discovery of relevant or admissible information. Additionally, the request is overbroad as to time. The documents, to the extent they still exist, will not be produced.

8. Full and complete copies of any and all documents that show the annual value of the benefits package provided to the Plaintiffs, Terri Pechner-James and Sonia Fernandez respectively from September 1995 to Present.

Objection. This request is irrelevant and not reasonably calculated to lead to the discovery of relevant or admissible information. Moreover, these records should already be in Plaintiffs' possession. Additionally, the request is overbroad as to time. The documents, to the extent they still exist, will not be produced.

9. Full and complete copies of any and all documents that show all payments, including but not limited to salary payments, disability payments made to the Plaintiffs, Terri Pechner-James and Sonia Fernandez, include the date and purpose of said payments.

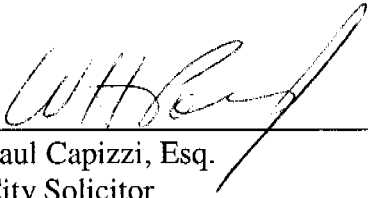
Objection. This request is irrelevant and not reasonably calculated to lead to the discovery of relevant or admissible information. Moreover, these records should already be in Plaintiffs' possession. Additionally, the request is overbroad as to time. The documents, to the extent they still exist, will not be produced.

10. Full and complete copies of any and all documents that show all payments made to medical and/or health related institutions for services to the Plaintiff, Terri Pechner-James and Sonia Fernandez; include the date and purpose of said payments.

Objection. This request is irrelevant and not reasonably calculated to lead to the discovery of relevant or admissible information. Additionally, the request is overbroad as to time. The documents, to the extent they still exist, will not be produced.

11. Full and complete copies of any and all documents that show the conclusions stated by OSHA in its formal report about the poor working conditions at the Revere Police Department.

Objection. This request is irrelevant and not reasonably calculated to lead to the discovery of relevant or admissible information. Additionally, the request is overbroad as to time. The documents, to the extent they still exist, will not be produced



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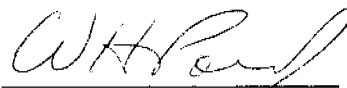
Dated: March 1, 2005

**CERTIFICATE OF SERVICE**

I, Walter H. Porr, Jr., Assistant City Solicitor and counsel of record for the Defendants, City of Revere, Revere Police Department, Mayor Thomas Ambrosino and Police Chief Terence Reardon, hereby certify that I have, this day forwarded a copy of the foregoing Defendants, City of Revere's, City of Revere Police Department's, Mayor Thomas Ambrosino's and Police Chief Terence Reardon's Answers to Plaintiffs, Terri Pechner-James' and Sonia Fernandez' First Request for Production of Documents to all parties herein by mailing same, this date, via first class mail, postage prepaid to:

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Dated: March 2, 2005